

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA, )  
Plaintiff, )  
 )  
V. ) Case No. 12-00291-19-CR-W-GAF  
 )  
 )  
VICTOR VICKERS )  
Defendant. )

MOTION FOR SUPPLEMENTAL DETENTION HEARING

COMES NOW, Victor Vickers, Defendant, by and through his undersigned Attorney of Record, William David Langston of Langston Law, Chartered, and moves this Court for It's Order granting a supplemental detention hearing in the above styled case. In support of Defendant's motion the following is offered:

1. An initial detention hearing was held on March 6, 2014. Evidence was presented;
2. Detention decision was taken under advisement by Judge Hays;
3. Defense counsel has been presented with additional evidence that Defendant would like the Court to consider;
4. The additional evidence consists of the 911 call in *State of Missouri vs. Victor Vickers*, the murder case discussed at the initial detention hearing. The 911 conversation will state that the victim, Kristen Forbush, could not make any identification of her attackers;
5. At the initial detention hearing, AUSA Stefan Hughes stated the victim, Kristen Forbush, not only could identify her attackers, but also recognized them.
6. This request is not made for undo delay or vexatious reasons;

7. The Interest's of Justice will be served by granting this continuance.

WHEREFORE, Defendant prays this Honorable Court issue its Order granting Defendant's request allowing him a supplemental detention hearing to present additional evidence.

Respectfully Submitted,

/s/ William David Langston  
Missouri Bar No. 33021  
Langston Law, Chartered  
115 East Park Street, Suite C  
Olathe, Kansas 66061  
Telephone: (913)341-8530  
Facsimile: (913) 390-9511  
[langstonlaw@sbcglobal.net](mailto:langstonlaw@sbcglobal.net)  
ATTORNEY FOR DEFENDANT

I hereby certify that on March 10, 2014, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the Assistant United States Attorney.

/s/ William David Langston  
Missouri Bar No. 33021  
Langston Law, Chartered  
115 East Park Street, Suite C  
Olathe, Kansas 66061  
Telephone: (913)341-8530  
Facsimile: (913) 390-9511  
[langstonlaw@sbcglobal.net](mailto:langstonlaw@sbcglobal.net)  
ATTORNEY FOR DEFENDANT